

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

**Date/Time:** February 1, 2001/1430

**Site Contact(s):** Jeff Stevens and Dyan Foss  
**Phone:** 5797 and 7577

**Regulatory Contact:** Mark Aguilar and Ernie Lombardi  
**Phone:** 303-312-6251 and (303) 312-6257

**Agency:** Environmental Protection Agency

**Purpose of Contact:** Discuss EPA comments on the 771 DOP modification

**Discussion:** Discussed the attached responses to EPA concerns on the 771 DOP modification. EPA comments are in black and K-H responses are in blue. Resolved the issues. *Mark Aguilar would like an electronic version of the DOP once the redlining is complete, to verify number 8.*

**Contact Record Prepared By:** Dyan Foss *DF*

**Required Distribution:**  
Administrative Record

**Additional Distribution:**



Contact Record 4/10/00  
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## **EPA Comments on the 771 DOP Mod. 3**

The following are general comments, which, merit further discussion and consideration:

1. The cerium (IV) nitric acid treatment process may prove to be more valuable as a BDAT for treatment/disposal of RCRA regulated tanks - see my earlier comments dated 11/16/2000. For TRU, we are better off as TRUM if it meets LDR. For greater than 10 and less than 100 nanocuries per gram waste, this statement may be true; however, the Site experience indicates that piping and other miscellaneous equipment is not a problem. The cerium nitrate process has been incorporated in the RSOP for Component Removal, Size Reduction, and Decontamination Activities, which is incorporated into the DOP through reference. Therefore, the treatment process will be evaluated for use as a decontamination method for the 771 Closure Project.
2. EPA needs to modify (perhaps through a variance) the application of the "mixture rule" to transuranic debris waste - see earlier comments to EPA's LDR ANPRM published in the FR on 6/19/00. No response required.
3. The use of fixatives on glove boxes and other process equipment to meet SCO II criteria is not recommended. Fixatives are acceptable if the fixatives are not flammable. Non-flammable fixatives are currently being used on-Site.
4. Table 7 indicates that most of the radioactive waste projected to be generated by building closure is expected to be low level waste, with heavy reliance on meeting LLW, SCO criteria. Most glove boxes and other plutonium processing equipment, in my opinion, will be disposed of as TRU or TRM wastes. The table included in the DOP indicates the projected waste volume based on current estimates using historical knowledge. As the decommissioning activities progress, the feasibility of meeting the SCO criteria will be determined.

5. Scabbling as a technique for decontaminating concrete surfaces in process areas may not be as effective as anticipated. This is based on the limited data reported in a 1994 Rocky Flats report - successful decontamination of a utility corridor was described as achieving "contamination levels of less than 250 cpm direct alpha, which is considered radiologically uncontaminated". Most contaminated concrete and other building materials will more than likely be disposed of as LLW waste. Some of the more heavily contaminated materials may even be TRU waste. As the decommissioning activities progress, the feasibility of decontaminating concrete surfaces will be determined.
6. Table 10 indicates material recycling options - doubtful if few or any of these options can actually be achieved. As the decommissioning activities progress, the feasibility of the recycling options will be determined.
7. Bottom line is that the plan is too optimistic in being able to "decontaminate" or "clean" stuff in order to meet less stringent disposition and/or disposal requirements. Not sure whether technology is currently available, or measurement techniques will be good enough, to demonstrate that this can actually be achieved. Could ultimately end up spending a lot of time and money with very little, if any success. As the decommissioning activities progress, the feasibility of decontaminating concrete surfaces will be determined. Economics are always taken into account when assessing a decontamination method. If the decontamination is more expensive than wasting the items, then the item will be wasted.
8. Clearly state all areas that need or will possibly need to be addressed in the future. These tie-ins are a must for further consideration of this proposal and other similar proposals. Additional language has been added throughout the DOP to indicate when conditions are different than those document in the DOP that LRA consultation will occur.

If you have any questions, please feel free to contact Mark Aguilar at (303) 312-6251 or Ernie Lombardi at (303) 312-6257.